IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et al.	)	
	)	
Plaintiffs,	)	
	)	C.A No.: 03-335-L
vs.	)	
	)	
AMERICAN FOAM CORPORATION,	)	
et al.	)	
Defendants.	)	

DEFENDANT BUSCH MEDIA GROUP, INC.'S ANSWER TO PLAINTIFFS' PRO FORMA COMPLAINT AND NOTICE OF ADOPTION OF THIRD AMENDED MASTER COMPLAINT

NOW COMES Defendant Busch Media Group, Inc. ("BMG") and in response to Plaintiffs' Pro Forma Complaint Regarding Station Nightclub Fire Litigation ("Pro Forma Complaint") and Notice of Adoption of Third Amended Master Complaint filed on February 28, 2006, BMG hereby adopts its Answer and Affirmative Defenses to Plaintiffs' Third Amended Master Complaint, filed on April 28, 2006, in *Gray, et al. v. Derderian, et al.*, C.A. No. 04-312-L.

Further, in response to the additional allegations, claims and prayer for relief set forth by Plaintiffs in their Pro Forma Complaint, BMG states as follows:

PARTIES

Plaintiffs

260.[1] BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 260 of Plaintiffs' Pro Forma Complaint.

261. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 261 of Plaintiffs' Pro Forma Complaint.

262. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 262 of Plaintiffs' Pro Forma Complaint.

263. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 263 of Plaintiffs' Pro Forma Complaint.

264. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 264 of Plaintiffs' Pro Forma Complaint.

265. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 265 of Plaintiffs' Pro Forma Complaint.

266. BMG is without knowledge or information sufficient to form a

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[1]These paragraph numbers appear to correspond to reserved paragraphs of the First Amended Master Complaint in *Gray v. Derderian* (04-312-L).

belief as to the truth of the allegations contained in paragraph 266 of Plaintiffs' Pro Forma Complaint.

267. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 267 of Plaintiffs' Pro Forma Complaint.

268. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 268 of Plaintiffs' Pro Forma Complaint.

269. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 269 of Plaintiffs' Pro Forma Complaint.

270. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 270 of Plaintiffs' Pro Forma Complaint.

271. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 271 of Plaintiffs' Pro Forma Complaint.

272. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of Plaintiffs' Pro Forma Complaint.

273. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of Plaintiffs' Pro Forma Complaint.

274. BMG is without knowledge or information sufficient to form a

belief as to the truth of the allegations contained in paragraph 274 of Plaintiffs' Pro Forma Complaint.

275. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of Plaintiffs' Pro Forma Complaint.

276. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of Plaintiffs' Pro Forma Complaint.

277. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 277 of Plaintiffs' Pro Forma Complaint.

278. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of Plaintiffs' Pro Forma Complaint.

279. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 279 of Plaintiffs' Pro Forma Complaint.

280. BMG is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 280 of Plaintiffs' Pro Forma Complaint.

WHEREFORE, Defendant Busch Media Group, Inc. prays that:

(a) the Third Amended Complaint, Notice of Adoption and Pro Forma Complaint be dismissed with prejudice as to Busch Media Group, Inc.;

(b) Plaintiffs' demand for relief against Busch Media Group, Inc. be denied in every respect;

(c) Busch Media Group, Inc. be awarded costs in connection with this litigation, including reasonable attorneys' fees; and

(d) the Court grant such other and further relief as may be just, proper, and equitable.

BUSCH MEDIA GROUP, INC. HEREBY DEMANDS TRIAL BY JURY

BUSCH MEDIA GROUP, INC.

By its Attorneys,

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Dated: August 18, 2006

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CERTIFICATE OP SERVICE

I hereby certify that I caused to be served a copy of the within document in pdf format by electronic email, unless otherwise indicated, on this 18th day of August 2006, to the following counsel of record and via regular mail where indicated:

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